

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

DO NO HARM, a nonprofit corporation
incorporated in the State of Virginia,

Plaintiff,

v.

WILLIAM LEE, in his official capacity as
Governor of the State of Tennessee,

Defendant.

No. 3:23-cv-01175

JUDGE CAMPBELL

MAGISTRATE JUDGE HOLMES

JOINT MOTION FOR ENTRY OF A MODIFIED CASE MANAGEMENT ORDER

Pursuant to the Court's Initial Case Management Order, ECF No. 22, the parties hereby move for entry of a modified case management order. A copy of the proposed order is included as an attachment to this joint motion and emailed to chambers.

DATED: July 31, 2024.

Respectfully submitted,

/s/ Reed N. Smith

Reed N. Smith (#040059)
Trenton Meriwether (#38577)
Tennessee Attorney General's Office
P.O. Box 20207
Nashville, Tennessee 37202
(615) 741-3491
reed.smith@ag.tn.gov
trenton.meriwether@ag.tn.gov

Attorneys for Defendant

/s/ Laura D'Agostino

Laura D'Agostino, Va. Bar No. 91556*
PACIFIC LEGAL FOUNDATION
3100 Clarendon Boulevard, Suite 1000
Arlington, VA 22201,
(202) 888-6881
LDAgostino@pacificlegal.org

Joshua P. Thompson, Cal. Bar No. 250955*
PACIFIC LEGAL FOUNDATION
555 Capitol Mall, Suite 1290
Sacramento, CA 95814
(916) 419-7111
JThompson@pacificlegal.org

Daniel J. Turklay (#034600)
Turklay Law

11205 Lebanon Rd #51
Mt. Juliet, TN 37122
(615) 838-5903
daniel@turklaylaw.com
Attorneys for Plaintiff

**Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2024, the forgoing document was served upon counsel for the defendant via CM/ECF service.

Reed N. Smith
Trenton Meriwether (#38577)
Tennessee Attorney General's Office
P.O. Box 20207
Nashville, Tennessee 37202
reed.smith@ag.tn.gov
trenton.meriwether@ag.tn.gov

/s/ Laura M. D'Agostino
Laura M. D'Agostino